

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, <i>et al.</i> ,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Case No. 5:21-cv-844-XR
	§	
GREGORY W. ABBOTT, <i>et al.</i> ,	§	
<i>Defendants.</i>	§	

OCA-GREATER HOUSTON, <i>et al.</i> ,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Case No. 1:21-cv-780-XR
	§	
JOSE A. ESPARZA, <i>et al.</i> ,	§	
<i>Defendants.</i>	§	

HOUSTON JUSTICE, <i>et al.</i> ,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Case No. 5:21-cv-848-XR
	§	
GREGORY WAYNE ABBOTT, <i>et al.</i> ,	§	
<i>Defendants.</i>	§	

LULAC TEXAS, <i>et al.</i> ,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Case No. 1:21-cv-0786-XR
	§	
JOSE ESPARZA, <i>et al.</i> ,	§	
<i>Defendants.</i>	§	

MI FAMILIA VOTA, <i>et al.</i> ,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	Case No. 5:21-cv-0920-XR
	§	
GREG ABBOTT, <i>et al.</i> ,	§	
<i>Defendants.</i>	§	

STATE DEFENDANTS' INITIAL DISCLOSURES

TO: The LUPE Plaintiffs, by and through their attorney of record, Nina Perales, Mexican American Legal Defense and Education Fund, 110 Broadway, Suite 300, San Antonio, TX 78205; The OCA-Greater Houston Plaintiffs, by and through their attorney of record, Ryan V. Cox, Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741; The Houston Justice Plaintiffs, by and through their attorney of record, Sarah M. Cummings, Reed Smith LLP, 2850 N. Harwood Street, Suite 1500, Dallas, TX 75201; The LULAC Plaintiffs, by and through their attorney of record, John R. Hardin, Perkins Coie LLP, 500 North Akard Street, Suite 3300, Dallas, Texas 75201-3347; and The Mi Familia Vota Plaintiffs, by and through their counsel of record, Sean Lyons, Lyons & Lyons, P.C., 237 W. Travis Street, Suite 100, San Antonio, Texas 78205.

Texas Governor Greg Abbott, Secretary of State John Scott, and Attorney General Ken Paxton, each in his official capacity, (collectively, “State Defendants”) hereby submit the following initial disclosures in accordance with Rule 26(a)(1) of the Federal Rule of Civil Procedure. The State Defendants provide these disclosures subject to pending motions to dismiss and do not concede the viability of any claim against any State Defendant. Nor does any State Defendant waive any protections provided by the attorney work product protection, attorney-client privilege, or any other applicable privilege, protection, doctrine, or immunity. The State Defendants reserve the right to supplement these Initial Disclosures as additional discovery, investigation, and analysis may warrant. The State Defendants likewise do not waive the right to object, on any and all grounds, to (1) the evidentiary use of the information contained in these Disclosures; or (2) discovery requests relating to these Disclosures.

INITIAL DISCLOSURES

I. The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support his or her claims or defenses, unless the use would be solely for impeachment.

A. Legislative Authors and Sponsors

The following state Representatives and Senators are authors, co-authors, sponsors, or co-sponsors of S.B. 1 or the three predecessor bills. These are (1) An Act Relating to Election

Integrity, H.B. 6, 87th Leg., Reg. Sess. (2021), (2) An Act Relating to Elections, S.B. 7, 87th Leg., Reg. Sess. (2021), and (3) Tex. Leg., An Act Relating to Election Integrity and Security, S.B. 1, 87th Leg., 1st Spec. Sess. (2021). The Legislative Authors and Sponsors may have discoverable information on the legislative process related to the passage of S.B. 1.

1. Senator Bryan Hughes.
110 N. College Ave., Ste. 207
Tyler, Texas 75702
2. Senator Paul Bettencourt.
11451 Katy Freeway, Suite 209
Houston, TX 77079
3. Senator Brian Birdwell.
900 Austin Avenue, Suite 500
Waco, TX 76701
4. Senator Dawn Buckingham.
4400 Buffalo Gap Road
Suite 0400
Abilene, Texas 79606
5. Senator Donna Campbell.
229 Hunters Village, Ste. 105
New Braunfels, TX 78132
6. Senator Brandon Creighton.
350 Pine Street, Suite 1450
Beaumont, Texas 77701
7. Senator Bob Hall.
Alliance Building #2
6537 Horizon Road, Suite B-1
Rockwall, Texas 75032
8. Senator Joan Huffman.
2900 Wesleyan Street, Suite 500

Houston, TX 77027

9. Senator Lois Kolkhorst.

2000 S. Market St. #101
Brenham, TX 77833

10. Senator Jane Nelson.

1225 S. Main Street, Suite 100
Grapevine, TX 76051

11. Senator Robert Nichols.

329 Neches Street
Jacksonville, TX 75766

12. Senator Angela Paxton.

604 S. Watters Road, Suite 100
Allen, TX 75013

13. Senator Charles Perry.

11003 Quaker Avenue, #101
Lubbock, TX 79424

14. Senator Charles Schwertner.

3000 Briarcrest Drive
Suite 202
Bryan, TX 77802

15. Senator Drew Springer.

100 Austin Ave.
Suite 103
Weatherford, TX 76086

16. Senator Larry Taylor.

6117 Broadway, Suite 122
Pearland, TX 77581

17. Representative Andrew Murr.

507 Earl Garrett Street
Kerrville, Texas 78028

18. Representative J.M. Lozano.
1512 Wildcat Dr. Suite 100
Portland, Texas 78374
19. Representative Travis Clardy.
202 East Pilar, Room 310
Nacogdoches, Texas 75961
20. Representative James White.
205 N. Charlton Street
Woodville, Texas 75979
21. Representative Jacey Jetton.
1108 Soldiers Field Dr., Suite 100
Sugarland, Texas 77479
22. Representative Steve Allison.
1635 NE Loop 410, Suite 506
San Antonio, Texas 78209
23. Representative Charles Anderson.
900 Austin Ave., Suite 804
Waco, Texas 76701
24. Representative Trent Ashby.
2915 Atkinson Dr.
Lufkin, Texas 75901
25. Representative Ernest Bailes.
10501 Hwy 150, Suite B
Shepherd, Texas 77371
26. Representative Cecil Bell.
18230 FM 1488, Ste. 302
Magnolia, Texas 77354
27. Representative Keith Bell.
100 E. Corsicana St., Suite 204

Athens, Texas 75751

28. Representative Kyle Biedermann.

616 W. Main St., Suite 101, 101A, 102
Fredericksburg, Texas 78624

29. Representative Greg Bonnen.

174 Calder Rd., Ste. 116
League City, Texas 77573

30. Representative Brad Buckley.

1301 North Stagecoach Road
Salado, Texas 76571

31. Representative DeWayne Burns.

115 S. Main Street, Suite 202
Cleburne, Texas 76033

32. Representative Dustin Burrows.

10507 Quaker Avenue, Suite 103
Lubbock, Texas 79424

33. Representative Angie Chen Button.

1201 International Pkwy # 130
Richardson, TX 75081

34. Representative Briscoe Cain.

606 Rollingbrook Drive Suite 1E
Baytown, TX 77521

35. Representative Giovanni Capriglione.

1100 Bear Creek Parkway
Keller, Texas 76248

36. Representative Jeff Cason.

1600 Airport Fwy, Suite 370
Bedford, Texas 76022

37. Representative David Cook.

309 E. Broad Street
Mansfield, Texas 76063

38. Representative John Cyrier.

1017 Main St.
Bastrop, Texas 78602

39. Representative Drew Darby.

36 W. Beauregard Suite 517
San Angelo, Texas 76903

40. Representative Jay Dean.

101 E. Methvin, Suite 103
Longview, Texas 75601

41. Representative Jake Ellzey.

2340 Interstate 20 W., Suite 224
Arlington, Texas 76017

42. Representative James Frank.

1206 Hatton Rd.
Wichita Falls, Texas 76302

43. Representative John Frullo.

5717 66th St., Suite 116–117
Lubbock, Texas 79424

44. Representative Craig Goldman.

4521 South Hulen Street, Suite 208
Fort Worth, TX 76109

45. Representative Sam Harless.

6630 Cypresswood Dr., Suite 150
Spring, Texas 77379

46. Representative Cody Harris.

214 E. Elm St.
Hillsboro, TX 76645

47. Representative Cole Hefner.
115 W. 1st Street
Mount Pleasant, TX 75455
48. Representative Justin Holland.
101 E. Rusk St., # 201
Rockwall, Texas 75087
49. Representative Dan Huberty.
4501 Magnolia Cove Dr. #201
Kingwood, TX 77345
50. Representative Kyle Kacal.
3000 Briarcrest Dr., Suite 203,
Bryan, TX 77802
51. Representative Phil King.
Nan and Bob Kingsley Building
1710 Martin Drive
Weatherford, TX 76086
52. Representative Stephanie Klick.
6851 NE Loop 820, Suite 230
North Richland Hills, TX 76180
53. Representative Matt Krause.
1949 Golden Heights Rd., Suite 106
Fort Worth, Texas 76177
54. Representative John Kuempel.
200 N. River Street, #100-E
Seguin, Texas 78155
55. Representative Stan Lambert.
547 Chestnut
Abilene, Texas 79602
56. Representative Brooks Landgraf.

119 W. 4th St., Suite 206
Odessa, Texas 79761

57. Representative Jeff Leach.

550 S. Watters Road
Suite 280
Allen, TX 75013

58. Representative Ben Leman.

401 South Austin Street
Brenham, Texas 77833

59. Representative Will Metcalf.

1835 Spirit of Texas Way, Suite 100
Conroe, TX 77301

60. Representative Morgan Meyer.

3131 McKinney Avenue #649
Dallas, TX 75204

61. Representative Mays Middleton.

2101 Mechanic Street
Suite 245
Galveston, TX 77550

62. Representative Geanie Morrison.

1908 N. Laurent, Suite 500
Victoria, Texas 77901

63. Representative Jim Murphy.

9525 Katy Freeway
Suite 215
Houston, Texas 77024

64. Representative Candy Noble.

206 North Murphy Road
Murphy, Texas 75094

65. Representative Tom Oliverson.

12345 Jones Rd #221
Houston, Texas 77070

66. Representative Chris Paddie.

102 West Houston St.
Marshall, Texas 75670

67. Representative Tan Parker.

800 Parker Square, Suite 245
Flower Mound, TX 75028

68. Representative Jared Patterson.

5533 FM 423, Suite 503
Frisco, Texas 75034

69. Representative Dennis Paul.

17225 El Camino Real Blvd
Suite 415
Houston, TX

70. Representative Four Price.

Amarillo National Bank
Plaza Two, Suite 506
500 S. Taylor Street
Amarillo, Texas 79101

71. Representative John Raney.

4103 South Texas Avenue, Suite 103
Bryan, Texas 77802

72. Representative Glenn Rogers.

600 E Depot Street
Brownwood, TX 76801

73. Representative Scott Sanford.

115 West Virginia Street, Suite #103
McKinney, TX 75069

74. Representative Matt Schaefer.

200 E. Ferguson St., Suite 506
Tyler, TX 75702

75. Representative Matt Shaheen.

P.O. Box 2910
Austin, TX 78768-2910

76. Representative Hugh Shine.

4 South 1st
Temple, TX 76501

77. Representative Bryan Slaton.

P.O. Box 2910
Austin, TX 78768

78. Representative Shelby Slawson.

PO Box 286
Stephenville, TX 76401

79. Representative Reggie Smith.

421 N. Crockett St.
Sherman, Texas 75090

80. Representative John Smithee.

320 S. Polk, 1st Floor
Amarillo, Texas 79101

81. Representative David Spiller.

P.O. Box 447
Jacksboro, TX 76458
(512) 463-0526

82. Representative Phil Stephenson.

834 Third St.
Rosenberg, Texas 77471

83. Representative Lynn Stucky.

400 West Oak Street, Suite 106
Denton, Texas 76201

84. Representative Valoree Swanson.

23008 Northcrest Dr
Spring, TX 77389

85. Representative Ed Thompson.

2341 N. Galveston Ave., Suite 120
Pearland, Texas 77581

86. Representative Tony Tinderholt.

4381 W. Green Oaks Blvd. Ste. 107
Arlington, Tx 76016

87. Representative Steve Toth.

25700 Interstate Hwy 45, Ste. 100
Spring, TX 77386

88. Representative Gary VanDeaver.

710 James Bowie Drive
New Boston, Texas 75570

89. Representative Cody Vasut.

222 N Velasco Street, Suite 25
Angleton, TX 77515

90. Representative Terry Wilson.

710 Main Street
Suite 242
Georgetown, Texas 78626

B. Committee Members

The following state Representatives and Senators were members of the Senate State Affairs Committee, the House Elections Committee, or the House Select Committee on Constitutional Rights and Remedies during the consideration of S.B. 1 and the three predecessor bills listed above. They may have discoverable information on the legislative process related to the passage of S.B. 1, and specifically on hearings conducted on those bills.

1. Senate State Affairs Committee

- 91. Chairman Bryan Hughes. Chairman Hughes is listed above.
- 92. Vice Chairman Brian Birdwell. Vice Chairman Birdwell is listed above.
- 93. Senator Donna Campbell. Senator Campbell is listed above.
- 94. Senator Bob Hall. Senator Hall is listed above.
- 95. Senator Eddie Lucio.

1324 E. Madison St.,
Brownsville, TX 78520
- 96. Senator Jane Nelson. Senator Nelson is listed above.
- 97. Senator Beverly Powell.

1612 Summit Avenue, Suite 101
Fort Worth, TX 76102
- 98. Senator Charles Schwertner. Senator Schwertner is listed above.
- 99. Senator Judith Zaffirini.

1407 Washington Street
Laredo, TX 78040

2. House Select Committee on Constitutional Rights and Remedies

- 100. Chairman Trent Ashby. Address listed above.
- 101. Vice Chairwoman Senfronia Thompson.

10527 Homestead Road
Houston, TX 77016
- 102. Representative John Bucy III.

3016 Polar Lane Suite 108
Cedar Park, Texas 78613
- 103. Representative Travis Clardy. Representative Clardy is listed above.
- 104. Representative Charlie Geren.

6713 Telephone Rd Suite 301
Lake Worth, TX 76135

- 105. Representative Jacey Jetton. Representative Jetton is listed above.
- 106. Representative Ann Johnson.
5601 West Loop S
Suite C218
Houston, Texas 77081
- 107. Representative Stephanie Klick. Representative Klick is listed above.
- 108. Representative Brooks Landgraf. Representative Landgraf is listed above.
- 109. Representative Oscar Longoria.
1320 S. Main St.
Peñitas TX, 78576
- 110. Representative J.M. Lozano. Representative Lozano is listed above.
- 111. Representative Joe Moody.
7365 Remcon Circle C-301
El Paso, Tx 79912
- 112. Representative Mat Shaheen. Representative Shaheen is listed above.
- 113. Representative James White. Representative White is listed above.

3. House Elections Committee

- 114. Chairman Briscoe Cain. Chairman Cain is listed above.
- 115. Vice Chairwoman Jessica Gonzalez.
400 South Zang Blvd., Suite 1214
Dallas, Texas 75208
- 116. Representative Michelle Beckley.
3740 N Josey Lane, Suite 136
Carrollton, TX 75007
- 117. Representative John Bucy III. Representative Bucy is listed above.
- 118. Representative Travis Clardy. Representative Clardy is listed above.
- 119. Representative Art Fierro.
1790 Lee Trevino Dr.

Suite 307
El Paso, Texas 79936

120. Representative Jacey Jetton. Representative Jetton is listed above.

121. Representative Mike Schofield.

1550 Foxlake Drive
Suite 120,
Houston, TX 77084

122. Representative Valerie Swanson. Representative Swanson is listed above.

C. Committee Hearings Witnesses

Lists of the witnesses who testified on S.B. 1 are included in the legislative history compilations that are part of the document production accompanying these disclosures. *See* Part II.A. That list is incorporated herein. These persons may have discoverable information that relates to the claims and defenses at issue in this litigation, particularly as pertains to the reasons that members of the public expressed support or opposition to the legislation. The State Defendants do not have contact information for these persons at this time.

D. Plaintiffs

In addition to the specific parties and subjects identified below, the State Defendants hereby incorporate by reference those individuals and entities identified by the plaintiffs in their Rule 26(a)(1) Initial Disclosures.

1. Individual Plaintiffs

The following persons are plaintiffs in this case and have knowledge regarding the allegations set forth in their live pleading. They may be contacted through their counsel of record.

123. Jeffrey Lamar Clemmons.

124. Isabel Longoria.

125. James Lewin.

- 126. Marla López.
- 127. Marlon López.
- 128. Paul Rutledge.

2. Entity Plaintiffs

The following entities are plaintiffs in this case and have knowledge regarding the allegations set forth in Plaintiffs' live pleading. Moreover, all unidentified members, supporters, clients, and constituents of the Entity Plaintiffs, as well as all the unidentified members of Entity Plaintiffs' leadership, may have discoverable information that relates to the claims and defenses at issue in this litigation, particularly as it pertains to standing and any disability-based claim. Each Entity Plaintiff may be contacted through their counsel of record.

- 129. La Unión Del Pueblo Entero.
- 130. Friendship-West Baptist Church.
- 131. Anti-Defamation League Austin, Southwest, and Texoma Regions.
- 132. Southwest Voter Registration Education Project.
- 133. Texas Impact.
- 134. Mexican American Bar Association of Texas.
- 135. Texas Hispanics Organized for Political Education.
- 136. Jolt Action.
- 137. William C. Velasquez Institute.
- 138. FIEL.
- 139. LULAC Texas.
- 140. Voto Latino.
- 141. Texas Alliance for Retired Americans.
- 142. Texas AFT.

- 143. Mi Familia Vota.
- 144. OCA-Greater Houston.
- 145. League of Women Voters of Texas.
- 146. REVUP Texas.
- 147. Texas Organizing Project.
- 148. Workers Defense Action Fund.
- 149. Houston Justice.
- 150. Houston Area Urban League.
- 151. Delta Sigma Theta Sorority Inc.
- 152. The Arc of Texas.

E. Defendants

In addition to the specific parties and subjects identified below, the State Defendants hereby incorporate by reference those individuals and entities identified by the other defendants in their Rule 26(a)(1) Initial Disclosures.

The following persons are defendants in this case, in their official capacities as county election officials, and may have knowledge regarding the allegations set forth in Plaintiffs' live pleading. Each County Defendant may be contacted through their counsel of record.

- 153. Lupe C. Torres.
- 154. Jacque Callanen.
- 155. Isabel Longoria.
- 156. Dana DeBeauvoir.
- 157. Lisa Wise.
- 158. Michael Scarpello.
- 159. Yvonne Ramon.

F. Individuals with Information Related to Claims Asserted Under the ADA, Rehabilitation Act, and Section 208 of the VRA

Several Entity Plaintiffs and Individual Plaintiffs raise claims under the Americans with Disabilities Act (“ADA”), Rehabilitation Act, or Section 208 of the Voting Rights Act (“VRA”). To the extent that any of the Individual Plaintiffs or any of the members of Entity Plaintiffs have qualifying disabilities under the ADA or the Rehabilitation Act or require assistance voting by reason of blindness or disability under Section 208 of the VRA, those persons’ physicians have discoverable information on their patients’ disability or blindness and their treatment history. And to the extent that any of the Individual Plaintiffs or any of the members of Entity Plaintiffs require assistance voting because he or she is unable to read or write, those persons have discoverable information regarding educational records, and education history.

G. Miscellaneous Other Individuals

160. Jonathan White. Mr. White is the Chief of the Office of the Attorney General of Texas, Elections Integrity Division. He also testified before the Legislature during the consideration of S.B. 1. He may have discoverable information on the claims and defenses at issue in these cases. He may have information regarding election-related investigations and prosecutions, to the extent those materials are not privileged. Mr. White may be contacted through counsel of record for the State Defendants.
161. Keith Ingram. Mr. Ingram is the Director of the Office of the Texas Secretary of State, Elections Division. He also testified before the Legislature during the consideration of S.B. 1. He may have discoverable information on the claims and defenses at issue in these cases. Mr. Ingram may be contacted through counsel of record for the State Defendants.

The following persons may have discoverable information related to the claims and defenses at issue in these cases. And in addition to these individuals, there may be discoverable information related to the claims and defenses at issue in these cases in the possession of unnamed local election officials throughout the State of Texas, including but not limited to county clerks, county tax assessor-collectors, county election administrators, county commissioners, county

judges, the county chairs of political parties, city secretaries, any person acting as the early voting clerk, members of early voting ballot boards, members of signature verification committees, presiding judges, alternate presiding judges, election clerks, poll watchers, and district attorneys.

162. Chris Hollins. Mr. Hollins is the former Harris County Clerk. He may have discoverable information on voting practices related to S.B. 1. The State Defendants do not have contact information for Mr. Hollins.

II. A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in his or her possession, custody, or control and may use to support his or her claims or defenses, unless the use would be solely for impeachment.

A. Legislative History Compilations

A compilation of legislative-history materials for S.B. 1 (2d Special Session), S.B. 1 (1st Special Session), S.B. 7 (Regular Session), and H.B. 6 (Regular Session) are appended to these disclosures. The materials are made publicly available by Texas Legislature Online, and are bookmarked to denote separate documents. The State Defendants specifically reserve the right to amend or supplement these disclosures as they identify additional documents, testimony, and legislation that relate to the passage of S.B. 1.

B. Bill Analyses

Bill analyses of S.B.1 and its predecessor bills including analyses of their impact on state operations. Documents relating to these assessments may be found in the possession, custody, and control of the State Defendants. The State Defendants reserve claims of privilege and any protections provided by the attorney work product protection, attorney-client privilege, or any other applicable privilege, protection, doctrine, or immunity related to these materials.

C. Election Complaints

Election complaints may be submitted to the Secretary of State. If, after receiving a complaint alleging criminal conduct in connection with an election, SOS determines that there is

reasonable cause to suspect that the alleged criminal conduct occurred, SOS shall refer the complaint to the Attorney General for further investigation and possible prosecution. Documents relating to these complaints may be found in the possession, custody, and control of the Secretary of State or Office of the Attorney General. The State Defendants reserve claims of privilege and any protections provided by the attorney work product protection, attorney-client privilege, or any other applicable privilege, protection, doctrine, or immunity related to these materials.

Revised Forms

The Office of the Secretary of State has created or revised election-related forms, and is preparing other updated forms and related documents, in accordance with S.B. 1. Copies of these forms may be found in the possession, custody, and control of the Secretary of State. The State Defendants reserve claims of privilege and any protections provided by the attorney work product protection, attorney-client privilege, or any other applicable privilege, protection, doctrine, or immunity related to these materials.

D. Advisory Materials

The Office of the Secretary of State has issued election advisories and other guidance materials, and given presentations, to election officials that summarized the election-related legislation enacted in 2021. Documents relating to these materials may be found in the possession, custody, and control of the Secretary of State. The State Defendants reserve claims of privilege and any protections provided by the attorney work product protection, attorney-client privilege, or any other applicable privilege, protection, doctrine, or immunity related to these materials.

- III. A computation of each category of damages claimed by the disclosing party, who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material (unless privileged or protected from disclosure) on which each computation is based, including materials bearing on the nature and extent of injuries suffered.**

Not applicable.

- IV. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Not applicable.

Date: November 5, 2021

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

Respectfully submitted.

Patrick K. Sweeten
PATRICK K. SWEETEN
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** Application for Admission Pending*

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COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was emailed to all counsel of record on November 5, 2021, and that counsel consented to be served by email.

Patrick K. Sweeten
PATRICK K. SWEETEN